

Case 8:19-cv-00782 Document 1 Filed 04/29/19 Page 1 of 64 Page ID #:1

1 Roland Tellis (SBN 186269)
2 rtellis@baronbudd.com
3 David Fernandes (SBN 280944)
4 dfernandes@baronbudd.com
5 Elizabeth Smiley (SBN 318165)
6 esmiley@baronbudd.com
7 **BARON & BUDD, P.C.**
8 15910 Ventura Boulevard, Suite 1600
9 Encino, California 91436
10 Telephone: (818) 839-2333
11 Facsimile: (214) 520-1181

Elizabeth Cabraser (SBN 83151)
ecabraser@lchb.com
Nimish R. Desai (SBN 244953)
ndesai@lchb.com
**LIEFF CABRASER HEIMANN
AND BERNSTEIN, LLP**
275 Battery St., 29th Fl
San Francisco, CA 94111-3339
Telephone: 415-956-1000
Facsimile: 415-956-1008

David Stellings
dstellings@lchb.com
**LIEFF CABRASER HEIMANN
AND BERNSTEIN, LLP**
250 Hudson Street, 8th Fl
NY, NY 10012
Telephone: 212-355-9500
Facsimile: 212-355-9592

13 Attorneys for Plaintiffs Michael
14 Hernandez & Tammy Tyler,
15 individually, and on behalf of other
members of the public similarly
situated

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **SOUTHERN DIVISION**

19 MICHAEL HERNANDEZ & TAMMY
20 TYLER, individually, and on behalf of
21 other members of the public similarly
situated,

22 Plaintiffs,

23 vs.

24 HYUNDAI MOTOR AMERICA, INC., a
25 Delaware corporation, KIA MOTOR
26 AMERICA, INC., a Delaware corporation,
27 and ZF TRW AUTOMOTIVE HOLDINGS
CORP., a Delaware corporation,
Defendants.

Case No.:

CLASS ACTION COMPLAINT

